

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

UNITED STATES OF AMERICA,)	
)	
vs.)	CASE NO 1:21CR23
)	
RALPH THOMAS REACH)	

**DEFENDANT'S FIRST MOTION FOR
CONTINUANCE**

COMES NOW the Defendant, by counsel, and moves the Court for a continuance of the trial date in the above-styled matter, setting forth the following as and for his grounds.

1. Defendant is before this Court on serious charges of a very complex nature and covering an alleged time span of several years. The nature of the evidence in the case is voluminous, consisting of hundreds of thousands of documents, scores of witnesses and investigatory material dating back to 2014.

2. Your undersigned counsel was appointed by this Court on October 6, 2021, following the release of his prior counsel of record.

3. The trial date for this case is currently set for six weeks beginning on January 10, 2022. Counsel has conferred with the U.S. Attorney's Office and is under the impression that no objection will be raised to the Motion herein.

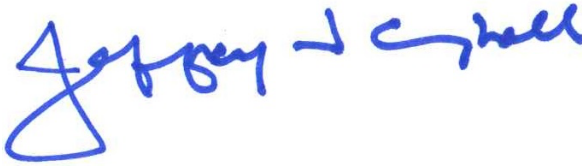
4. The ends of justice require that your undersigned counsel have adequate time to prepare a defense and, given the nature of the complexity and volume of evidence, there is simply inadequate time to do so prior to the currently scheduled trial date.

WHEREFORE, your undersigned counsel, hereby moves this Honorable Court for entry of an Order continuing the trial date in this matter so as to allow counsel

sufficient time to prepare and defend the charges herein.

**RALPH THOMAS REACH
- BY COUNSEL -**

/s/

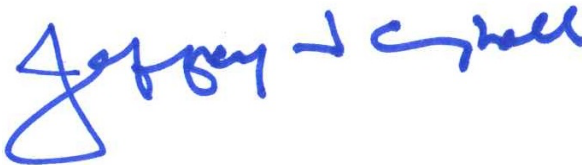


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CERTIFICATE OF SERVICE

I, Jeffrey L. Campbell, Counsel for Defendant, Ralph Thomas Reach, do hereby certify that I electronically filed the Defendant's Motion for Continuance with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the United States Attorney for the Western District of Virginia, by electronic mailing to USAVAW.ECFAbingdon@usdoj.gov and to all other counsel of record, on this the 19th day of October, 2021.

/s/



JEFFREY L. CAMPBELL